

## New policy for IA renewal By Bill O'Brien

For those A&P/IAs who are lucky enough in this day and age to have busy, full-time jobs in busy repair stations or FBOs, the IA renewal process is nothing to get excited about. Most of these folks figure the IA renewal process is “just” a government paperwork exercise that comes due every March so the FAA can update their IA data base.

However, for IAs looking at an empty hangar floor three days out of five, meeting the IA renewal requirements every March can be a serious concern, a concern because these technicians might not have enough annuals completed or Form 337s filled out to meet the Inspection Authorization (IA) renewal requirements of FAR Part 65, section 65.93.

### Renewal requirements

What are the requirements? The IA renewal requirements are spelled out in FAR 65, section 65.93: IA renewal. Paraphrasing the requirements an IA can renew if he or she:

1. Still meets the requirements of section 65.91 such as having a fixed base of operations, current data, actively engaged, etc.
2. Performed one annual for each 90 days the IA was held, or
3. Performed two major repairs or alterations for each 90 days the IA was held, or
4. Performed or supervised and approved one progressive inspection, or
5. Attended and successfully completed an eight-hour refresher course acceptable to the FAA, or
6. Successfully completed an oral test given by an FAA inspector on the current regulations and standards applicable to an IA.

For some strange reason no one here in Washington can fathom, even experienced IAs who did annuals on the Wright Brothers' flyer are reluctant to take advantage of requirement No. 6.

If an IA for any number of reasons, does not meet renewal requirements of No. 2, No. 3, or No. 4 and No. 6 is not considered an option to the individual, then the next best bet is requirement No. 5 to satisfy the feds. Unfortunately, the No. 5 option, the eight-hour FAA IA road show that over one-third of the IAs relied on to get renewed, is no longer an alternative.

### What happened to the FAA eight-hour seminar?

For the last 20 years an average of 3,500 IAs a year have parked their rumps on hardback chairs for eight hours, overdosed on bitter coffee, and nibbled on a granite hard donut or two while listening to FAA instructors give them the definitive word on the Federal Aviation Regulations. For 18 of those years the eight-hour renewal course was free. All an IA had to do was show up. The FAA picked up all the training costs and sometimes even the coffee. But for the last two years, due to severe budget cuts and reorganization, Flight Standards Service was forced to charge the IA \$60 for the eight-hour renewal course.

Despite the best FAA attempts at explaining the realities of a fiscally responsible government (and we weren't were making a dime over expenses), IA's nationwide rebelled at the idea of a government user fee for something that was free for so many years. So they voiced their opinion with their feet, and beginning in April of last year, IAs stayed away from the FAA scheduled courses in droves.

The FAA, like any other business, when it runs out of customers, money, and ideas all at the same time, was forced to shut down. Fortunately, to their credit, the folks in Oklahoma City left the door open for customers' requests for on-demand IA presentations.

The Fix is in?

Beginning October 1, 1995, AFS-340, General Aviation and Commercial Branch (Airworthiness) in Washington, D.C., initiated new policy concerning IA Renewal Seminar Acceptance procedures. For you purists out there, the information is found in FAA Flight Standards Handbook Bulletin HBAW 95-03A.

The first big policy change states that your local Flight Standards District Office (FSDO) IA renewal meeting will NOT be considered part of the eight-hour renewal training seminar. Why not? For the uninitiated, the FSDO's IA renewal meeting happens one time a year — usually in March. On a given date, time, and place, IAs mass to renew their inspection authorization. The renewal meeting could be identified as a “one part social hour” and “one part business.” The social part comes in when IAs engage in small talk with their assigned FAA airworthiness inspector in a thinly disguised attempt to find out when the fed is coming out to do an IA surveillance check on them. A few IAs circulate around the crowd and feign good fellowship with their competitors. Others painstakingly fill out the renewal paperwork with a borrowed government pen which they never return.

The business part of the meeting comes in play in the last two hours or so which are spent nodding to a sermon on filling out Form 337 and M&D reports from the FSDO's new FAA airworthiness inspector. In contrast to the FAA inspector's shaky public speaking debut, the end of the IA's renewal meeting is a little more formal up to a point.

The senior FAA inspector, following strict rules of etiquette and decorum, calls each IA's name and presents the IA his newly signed IA card. The ceremony is followed by a quick volley of good-byes, and a hasty retreat to the parking lot by both the IAs and FAA inspectors. Despite my slight embellishment of the truth, I think you now can see Washington rational why we don't consider the renewal meeting — Training.

The next big change is that anyone, and this includes the local FAA FSDO, who wants to put on maintenance training, such as Federal Aviation Regulations, aircraft systems, maintenance procedures, etc., must get the training course “accepted” by an FAA regional office.

The only exception to this new policy change is that training conducted by aircraft, engine, propeller, or appliance manufacturers or their authorized representatives is considered “acceptable” to the FAA without further showing.

What kind of maintenance training is “acceptable?”

IA refresher training must be directly related to regulations, FAA policy, maintenance, inspection, repair, or alteration of aircraft, and their related parts. The training cannot be an infomercial for a new or existing product, or a collection of war stories that is long on B.S. but short on substance. All training that is presented for IA renewal must be kept current at all times.

Training received on military aircraft such as C-130, F-15, or F-18 and related systems is NOT acceptable because military aircraft do not meet FAA-type design standards. However, military training on similar civilian maintenance-related subjects such as corrosion control, NDI, or basic electrical system troubleshooting is acceptable.

The FAA will also accept training on large civilian multiengine turbine, or transport category aircraft and related systems, even though the IA will never sign off an annual on these kinds of aircraft. This kind of training on large multiengine turbine or transport category aircraft must be done by the manufacturer or his authorized representative.

The required eight hours of training can be obtained at anytime during the 12-month period from April to March of the following year. If desired the renewal training can be broken up into eight one-hour sessions or in two-hour session blocks or larger. However, the FAA will not accept training less than one hour long.

How does the training become

### “FAA Accepted?”

FAA has set in place two kinds of acceptance procedures to handle both “individually” developed IA renewal training and training put on by a large organization like PAMA, NATA, NBAA, etc. In order for the training to become “accepted,” both the individual and large organization must submit an overview or outline of the course material that will be presented. The overview must have sufficient scope and detail so the FAA can determine that the requirements of FAR 65, section 65.93 can be met.

The only difference in the FAA acceptance procedures between an individually produced training program and one presented by a large organization or trade association is who in the FAA the training program is sent to so it can be reviewed.

### Procedures for individually produced training:

For an individually produced and developed IA training program, the individual must send it to the FAA regional airworthiness safety program manager. (The local FSDO can give you his or her name and address.) Once the training program is “accepted” by the regional folks, the training can be presented anywhere in the world, and it would be accepted by the FAA for IA renewal.

I know that there has to be at least one IA out there with an overactive imagination. So in his or her interest and the FAA, I offer the following heads up: If an IA goes to the same one-hour training program, let’s say it’s on air-conditioning servicing, at eight different locations at different times during the year, with the expectation of meeting the rule, I don’t recommend it. To be brief and blunt, the IA will not get renewed in March because repeats don’t count.

### Application procedures for large organizations

For an IA program presented by a large organization, the applicant must send it to:

#### FAA Headquarters

Attention: Ed Ortiz, AFS-340  
800 Independence Ave., S. W.  
Washington, D.C. 20591

If the training package is accepted by AFS-340, the organization can present the training program anywhere in the world and it would be accepted by all FAA FSDOs for IA renewal.

So you won’t be left hanging around waiting for an answer, in both cases, the individual developed training and the large organization developed training, the FAA must either accept or deny the training package within 30 days of receipt of the training program.

If the applicant is successful, he or she will receive a letter of acceptance which says the training program is accepted for one year. This original letter of acceptance or a copy must be available at each training session for review by both the attendees and the FAA.

What happens if the FAA says “NO!”

In the interest of preventing mass civil unrest in the aviation maintenance community, the FAA has come up with the counterpart of a Federal Court of Appeals to hear complaints. If an applicant’s training program is rejected by the FAA, the applicant can ask for a reconsideration of their training program by the Aircraft Maintenance Division in Washington. The training program will receive a one-time review by senior FAA management, and the applicant will receive a final decision to affirm, modify, or reverse the initial decision within 30 days of receipt of the request.

### Responsibilities of the trainer

The training organization or individual is required to keep the following documentation:

1. Letter of acceptance
2. Name, date and description of the training course.
3. Each course instructor's name and his or her affiliation.
4. Length in hours of the training presented.
5. List of attendees. (This list is kept for two years)
6. Ensure that the course material is current.
7. Notify the local FSDO in writing at least 30 days before the training is presented.
8. Allow the FAA to audit the course without charge.
9. Provide course material to the FAA without charge.
10. Provide a certificate of training for each attendee.

When the "accepted" course is revised or updated, the new training material must be reviewed by the FAA organization that issued the original letter of acceptance. Once the new training material is "accepted" another letter of acceptance will be issued by the FAA. This new letter of acceptance must be attached to the original letter. But be advised that the revision's letter of acceptance will not change the original letter's one-year effective date.

To reinstate the training program after the one- year effective date, all the trainer has to do is send a letter to the FAA shop who originally accepted the training program and include a statement that declares the training course material is current. Then you are back in business for another year.